## EXHIBIT D

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

PROVIDENCE TITLE COMPANY	§	
Plaintiff,	§ § 8	Civil Action No. 4:21-cv-00147
٧.	8 §	CIVII / Motion 140. 4.21-64-0014/
	§	
TRULY TITLE, INC., TRACIE L.	§	
FLEMING, MARK J. FLEMING,	§	
KIM SHEETS-SHEFFIELD, AND	§	
GRAHAM HANKS	§	
	§	
Defendants.	§	
	§	

## **DECLARATION OF CLARISSA CHRISTMAN**

In accordance with 28 U.S.C. § 1746, Clarissa Christman declares, under penalty of perjury, as follows:

- 1. I am Clarissa Christman. I am over the age of twenty-one (21), of sound mind, and am competent to make this declaration. The information contained herein is within my personal knowledge.
- 2. I am employed by Providence Title Company ("Providence"), the plaintiff in the above-captioned lawsuit. From my role with Providence, I know that T. Fleming was the President, a shareholder, and a member of the Providence Board of Directors as of February 1, 2021.
- 3. On Monday, February 1, 2021, I was asked to meet with T. Fleming and others to discuss the recent resignation of Providence employee, Kim Sheets-Sheffield, who had turned in her resignation from Providence to go work for Truly. We also discussed strategy on how to make sure Providence did not lose any other staff from the Southlake/Keller offices, including Kami

Wilson, Emily Elliott, Ariel Immel, and Lindsey Newman who all worked closely with Kim Sheets-Sheffield.

- 4. During the meeting, T. Fleming did not disclose that she was already under contract to leave Providence to join Truly. I did not learn of T. Fleming's departure until after she turned in her resignation.
- 5. At no time before, during, or after my meeting with T. Fleming on February 1, 2021, did she disclose that she had already signed a contract with Truly or that any other employees from Southlake/Keller would be leaving with her.
- 6. I first learned about the departure of T. Fleming and M. Fleming from Providence after they submitted their resignations on February 3, 2021.
- 7. After T. Fleming resigned, Ms. Wilson and Ms. Elliott, left employment with Providence to join Truly. Ms. Immel and Ms. Newman left employment with Providence to join Truly on February 1 and February 2 respectively.

I have reviewed the foregoing declaration and hereby declare under penalty of perjury that the foregoing is true and correct and within my personal knowledge.

Executed on this 23 day of February, 2021 in Tarrant County, Texas.